

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

Ronald C. Grumbkow,)
)
Plaintiff)
)
v.) C.A. No. 06-489 (JJF)
)
The Walt Disney Company,)
George J. Mitchell,)
Chairman of the Board &)
Robert A. Iger,)
President/Chief Executive Officer)
& Jeffrey Ruthizer,)
Vice-President/ABC Group)

MOTION TO DISMISS

Defendants, The Walt Disney Company, George J. Mitchell, Robert A. Iger, and Jeffrey Ruthizer (collectively, the "Defendants") hereby move, pursuant to Fed. R. Civ. P. 12(b)(2), 12(b)(4), 12(b)(5), and 12(b)(6) to dismiss Plaintiff Ronald C. Grumbkow's Complaint for lack of personal jurisdiction, insufficiency of process, insufficiency of service of process, and for failure to state a claim. The grounds for this Motion are more fully set forth in the Memorandum of Law in support of this Motion, filed contemporaneously herewith.

POTTER ANDERSON & CORROON LLP

By: Suzanne M. Hill
Robert K. Payson (#274)
Suzanne M. Hill (#4414)
Hercules Plaza, 6th Floor
1313 N. Market Street
P.O. Box 951
Wilmington, DE 19899
(302) 984-6000

Dated: September 11, 2006

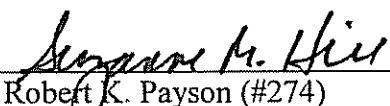
Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CERTIFICATE OF SERVICE

I, Suzanne M. Hill, hereby certify that on September 11, 2006, the attached documents were electronically filed with the United States District Court for the District of Delaware via CM/ECF (official Court electronic filing system) and two (2) true and correct copies were mailed via First Class Mail, Postage Prepaid to the following:

Ronald C. Grumbkow
32 Steeplechase Drive
Doylestown Hunt Estates
Doylestown, PA 18901



Robert K. Payson (#274)
Suzanne M. Hill (#4414)
Hercules Plaza, 6th Floor
1313 N. Market Street
P.O. Box 951
Wilmington, DE 19899
(302) 984-6000
kshannon@potteranderson.com
shill@potteranderson.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

Ronald C. Grumbkow,)	
)	
Plaintiff)	
)	
v.)	C.A. No. 06-489 (JJF)
)	
The Walt Disney Company,)	
George J. Mitchell,)	
Chairman of the Board &)	
Robert A. Iger,)	
President/Chief Executive Officer)	
& Jeffrey Ruthizer,)	
Vice-President/ABC Group)	

ORDER

AND NOW, having considered the Motion to Dismiss and Defendants' Memorandum of Law in Support of the Motion to Dismiss,

IT IS HEREBY ORDERED this _____ day of _____, 2006 that the Motion is GRANTED, and Plaintiff Ronald C. Grumbkow's Complaint is DISMISSED, with prejudice.

United States District Court Judge